

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: SUNEDISON, INC. SECURITIES
LITIGATION

Civil Action No. 1:16-md-2742-PKC

This Document Relates To:

Horowitz et al. v. SunEdison, Inc. et al.,
Case No. 1:16-cv-07917-PKC

**STIPULATION AND [PROPOSED] ORDER TO INCREASE THE MAXIMUM
NUMBER OF DEPOSITIONS ALLOWED**

WHEREAS, the parties are currently engaged in fact discovery in the above-captioned action (the “Action”);

WHEREAS, the parties intend to begin taking depositions of fact witnesses in connection with fact discovery in the “Action”;

WHEREAS, Rule 30(a)(2)(A)(i) of the Federal Rules of Civil Procedure allows each party to take a maximum of ten depositions;

WHEREAS, the parties anticipate the need to take additional depositions;

WHEREAS, the parties agree to increase the maximum number of depositions allotted to each side from ten to twenty;

WHEREAS, the parties agree to take depositions of no more than three representatives of any Underwriter Defendant, but reserve all rights to seek additional depositions of representatives of any party as appropriate; and

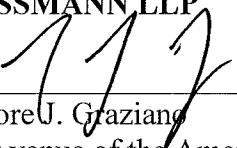
WHEREAS, the parties have not previously requested to increase the maximum number of depositions allowed to each party under the Federal Rules.

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the parties hereto, that each side may take a maximum of twenty depositions, and that

plaintiffs shall not take depositions of more than three representatives of any one Underwriter
Defendant absent good cause shown.

Dated: August 13, 2018

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SO ORDERED:

Hon. P. Kevin Castel
United States District Judge

Dated: August __, 2018